

## Turnkey Landfill NEW Air Permit Talking Points

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**ACTION NEEDED:** Ask DES to reject the amended air permit that allows more pollution from the expansion at the Turnkey Landfill in Rochester.

Tell DES why air pollution matters to you and pick any of the ideas below\* for your comments.

**DEADLINE:** Sep 13, 2023

**SEND TO:** Director Craig Wright, Air Resources Division

New Hampshire Department of Environmental Services

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Sheila S. Rydel, Environmental Program Manager, Air Resources Division

[sheila.s.rydel@des.nh.gov](mailto:sheila.s.rydel@des.nh.gov)

**WHO WILL READ COMMENTS:** air permit specialists in DES, not solid waste folks. Please focus on air pollution. Waste reduction ideas make sense to us, but DES Air Permit decision makers were clear about not considering waste reduction, e.g., diverting organic waste to composting.

**ENVIRONMENTAL INJUSTICE** - Rochester's median household gross income has declined substantially in only a few years, reaching \$47,000-66,000 based on a few sources. Percentage of residents living in poverty in 2021: 9.3% (8.7% for White Non-Hispanic residents, 23.0% for Black residents, 16.9% for Hispanic or Latino residents)

**THE PERMIT:** [amended federal Title V permit](#) –The old 2020 permit lasts until 2025, but a new permit may last longer. A Title V permit is required by Federal Laws because this facility is a major source for oxides of nitrogen (NOx), carbon monoxide (CO), and sulfur dioxide (SO2).

**THE EXPANSION – Expansion is big** - adds 1.4 – 1.5 million tons of waste/yr  
= **3,000 more trucks/wk** delivering waste from NH and other states.

**THE COMPANY** - Turnkey Recycling and Environmental Enterprises (TREE) in Rochester, NH. TREE is a subsidiary of Waste Management of New Hampshire, Inc. (WMNH), a large private waste company that operates across NH. Turnkey operators collect landfill gas and run four engines, two combustion turbines, and three flares to combust the collected gas. Some of the untreated landfill gas is piped to an on-site gas treatment facility owned and operated by the University of New Hampshire.

**AIR PERMIT PENDING:** Note: DES Solid Waste Div. permit or expansion was upheld by NH Supreme Ct. when it denied Conservation Law Foundation's appeal. Expansion construction has started, but the expansion triggered a review of an amended Title V air permit. ***This is our last chance to limit pollution from Turnkey.***

## **\*IDEAS FOR COMMENTS ON AIR PERMIT**

### General Gaps In Permit

- DES is not using its full authority to meet its obligation to protect air quality. DES follows only minimum Federal rules, but they can exceed them.
- The permit requires only minimum measures to verify compliance with DES limits for harmful substances. E.g., DES can regulate over 100 air toxic pollutants (RTAPs) including PFAS, but this permit tracks only one RTAP, formaldehyde.
- The permit states that RTAPs shall not exceed 24-hr or annual limits, but the permit does not provide a) adequate means for DES to verify emissions or b) require upgrades to Best Available Technology for all components at Turnkey.
- The permit relies on infrequent tests and estimates, but it could require much more. The permit requires testing only some equipment 120 days after installation and then every 1-3 years, depending on the equipment.

### Specific Gaps in Permit

#### **Landfill Gas Flaring**

- Problem  
Current flares are old, ineffective and dangerous.  
Two of the three flares are 38 and 21 years old, these low-cost models remove less pollutants than other models, and these old model flares generate toxics, e.g., benzene.
- Solution  
DES can require upgrades to ultra-low, contained flares that limit emissions by design and verify their emissions with frequent testing for PM and toxics known to escape flaring. This is Best Available Technology.

#### **Landfill Fugitive Emissions**

- Problem  
DES is using only the minimum for new quarterly ground-level testing required by EPA. They measure only methane in samples.
- Solution  
The same sample collection and test equipment could easily be used to measure many pollutants besides methane, e.g., benzene.

#### **No Mention of PFAS**

- Problem  
The permit requires no air testing or limits for PFAS, even though Turnkey has a documented problem with PFAS escaping into groundwaters and DES has developed regulations for air monitoring for PFAS. DES does not even require testing to establish a baseline. DES stated they must wait for EPA rules.
- Solution  
Begin with methods specified in other NH permits regarding PFAS, e.g., St. Gobain, and then update these after EPA sets federal guidelines.

## **Main Equipment**

- Problem  
Air pollutants from Turnkey travel. Several of the air pollutants from Turnkey, e.g., NOX and VOCs, harm lungs and trigger ozone that also harms lungs. These are measured only at Turnkey and not in communities surrounding the landfill.
- Solution  
Air monitoring in communities is feasible with low-cost reliable monitors for PM, VOC and ozone on rooftops of schools. These can provide real-time data for citizens to know when to avoid outdoor activities. Models for monitor placement at distances and directions from Turnkey are readily available.

## **Truck Emissions**

- Problem  
The permit does not consider substantial emissions from increased trucking (3,000 trips/week) into the facility and across the state. Diesel emissions are known to cause cancer and cardio-respiratory distress. State standards for truck emissions lag behind upgrades that trucks can install to limit emissions.
- Solution  
Require delivery trucks to meet the most recent standards that limit diesel emissions. These standards are available and have been used in city ordinances.